

**FILED**

**JUL 18 2018**

Clerk, U.S. District Court  
Texas Eastern

UNITED STATES DISTRICT COURTS  
EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

MANOJ C MADATHIL

Case Number: 4:18cv511

Name of Plaintiff(s)

vs

1. ACCENTURE LLP

2. Greg Leja (Managing Director, Communications, Media & Technology, Accenture)

3. Toni Corban (Human Resources organization, Accenture)

4. ANIL VARUGHESE (Human Resources organization, Accenture)

Name of Defendant(s)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

Note: If plaintiff is alleging employment discrimination based on race or color, please also see 42:U.S.C. 1981

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the court by 42 U.S.C. 2000e-5. Equitable and other relief are also sought under 42 U.S.C. 2000e-5(g).

- 2.. Plaintiff, MANOJ C MADATHIL, is a citizen of the United States  
(name of plaintiff)

and resides at 4660 JAZZ STREET, PLANO,  
(street address) (city)

COLLIN, TX, 75024, 214 605 0642  
(county) (state) (zip) (telephone)

ACCENTURE LLP,  
GREEN LEJA,  
TONE CORBAN

3.. Defendant, ANIL VARUGHESSE, resides at, or its business is  
(name of defendant)

located at 5221 N O'CONNOR BLVD #1400 IRVING  
(street address) (city)  
DALLAS, TX, 75039, 469 665 0000,  
(county) (state) (zip) (telephone)  
469 665 4524

4. Plaintiff sought employment from the defendant or was employed by the defendant

at 5221 N O'CONNOR BLVD #1400 IRVING  
(street address) (city)  
DALLAS, TX, 75039.  
(county) (state) (zip)

5. Defendant discriminated against plaintiff in the manner indicated in paragraphs 9 and 10

of the complaint on or about 2012 — April 2018.  
(month, day, year)

6. Plaintiff filed charges against the defendant with the Equal Employment Opportunity Commission charging defendant with the acts of discrimination indicated in paragraphs 9 and 10 of this complaint on or about

02/02/2018, 04/17/2018  
(month, day, year)

7. The Equal Employment Commission issued a Notice of Right to Sue which was received by plaintiff on

4/21/2018.  
(month day, year)

8. Because of plaintiff's (1) ☒ race, (2) ☒ color, (3) \_\_\_\_\_ sex,  
(4) ☒ national origin, defendant:

- a. \_\_\_\_\_ failed to employ plaintiff.  
b. ☒ terminated plaintiff's employment.  
c. ☒ failed to promote plaintiff.  
d. ☒ Other Disability discrimination  
resulting in wrongful Termination

9. The circumstances under which the defendant discriminated against plaintiff were as follows:

2012 - January 2017 / February 2017

During Plaintiff's employment at Accenture  
Defendant Greg Leja discriminated on the basis  
of Race, National Origin denying Promotions,  
Performance appraisals, Career opportunities

January 2017 - February 2017.

Greg Leja (Career Counselor of plaintiff), Toni Corban,  
Other employees in Human Resources Organization  
illegally terminated plaintiff based on religious  
Racial / National origin discrimination. Anil Vanghese  
of Human Resources Organization discriminated based  
on <sup>his</sup> disability of the plaintiff.

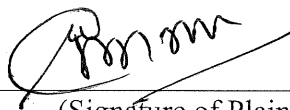
January 2018 - April 2018: Continued discrimination  
as manifested in the email responses from  
Toni Corban, Anil Vanghese and other HR Personnel.  
Kindly see the additional sheets attached for  
further description of the circumstances outlined  
above.

10. The acts set forth in paragraph 9 of this complaint:

- a. ☒ are still being committed by defendant.
- b. ☐ are no longer being committed by defendant.
- c. ☒ defendant may still be committing the acts.

11. Plaintiff attaches to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission which charges are submitted as a brief statement of the facts supporting this complaint. WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- a. ☐ Defendant be directed to employ plaintiff.
- b. ☒ Defendant be directed to re-employ plaintiff.
- c. ☒ Defendant be directed to promote plaintiff.
- d. ☒ Defendant be directed to Pay damages and that the Court grant such relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.



(Signature of Plaintiff)